

John Mejia (Bar No. 13965)
AMERICAN CIVIL LIBERTIES UNION OF
UTAH FOUNDATION, INC.
355 N. 300 W.
Salt Lake City, UT 84103
(801) 521-9862
(801) 532-2850 (fax)
jmejia@acluutah.org

*Attorneys for Plaintiff
Planned Parenthood Association of Utah*

**Admitted pro hac vice*

Julie Murray*
Hannah Swanson*
PLANNED PARENTHOOD FEDERATION
OF AMERICA
1110 Vermont Avenue, NW, Suite 300
Washington, DC 20005
(202) 803-4045
(202) 296-3480 (fax)
julie.murray@ppfa.org
hannah.swanson@ppfa.org

Jennifer Sandman*
Hana Bajramovic*
PLANNED PARENTHOOD FEDERATION
OF AMERICA
123 William Street, 9th Floor
New York, NY 10038
(212) 261-4584
(212) 247-6811 (fax)
jennifer.sandman@ppfa.org
hana.bajramovic@ppfa.org

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

PLANNED PARENTHOOD
ASSOCIATION OF UTAH, on behalf of
itself and its patients, physicians, and staff,

Plaintiff,

v.

RICHARD SAUNDERS, in his official
capacity as Interim Executive Director of the
Utah Department of Health, *et al.*,

Defendants.

Case No. 2:19-cv-00238

**PLAINTIFF'S POSITION ON STAYING
PROCEEDINGS IN LIGHT OF DOBBS
*V. JACKSON WOMEN'S HEALTH ORG.***

Hon. Clark Waddoups

Pursuant to the Court's Docket Text Order of June 22, 2021, Plaintiff Planned Parenthood Association of Utah (PPAU) submits its position on staying this case pending the U.S. Supreme Court's resolution of *Dobbs v. Jackson Women's Health Organization*, Case No. 19-1392.

PPAU does not believe that a stay is needed here, as the Court can resolve the parties' pending cross-motions for summary judgment under binding law and on the undisputed material facts already in the record before the Court. However, PPAU defers to the Court's preference and prerogative to manage its docket, including by staying all proceedings in this case until the Supreme Court issues an opinion in *Jackson Women's Health* or otherwise disposes of that matter.

Respectfully submitted,

/s/ Hannah Swanson
Julie Murray*
Hannah Swanson*
PLANNED PARENTHOOD FEDERATION
OF AMERICA
1110 Vermont Avenue, NW, Suite 300
Washington, DC 20005
(202) 803-4045
(202) 296-3480 (fax)
julie.murray@ppfa.org
hannah.swanson@ppfa.org

Jennifer Sandman*
Hana Bajramovic*
PLANNED PARENTHOOD FEDERATION
OF AMERICA
123 William Street, 9th Floor
New York, NY 10038
(212) 261-4584
(212) 247-6811 (fax)
jennifer.sandman@ppfa.org
hana.bajramovic@ppfa.org

/s/ John Mejia
John Mejia (Bar No. 13965)
AMERICAN CIVIL LIBERTIES UNION OF
UTAH FOUNDATION, INC.
355 N. 300 W.
Salt Lake City, UT 84103
(801) 521-9862
(801) 532-2850 (fax)
jmejia@acluutah.org

*Attorneys for Plaintiff Planned
Parenthood Association of Utah*

** Admitted pro hac vice*

Dated: July 7, 2021

CERTIFICATE OF SERVICE

I certify that on July 7, 2021, a true and correct copy of the foregoing PLAINTIFF'S POSITION ON STAYING PROCEEDINGS IN LIGHT OF *DOBBS V. JACKSON WOMEN'S HEALTH ORG.* was filed through CM/ECF and thus served by e-mail on the following counsel who are registered filers:

David N. Wolf
dnwolf@agutah.gov
Lance Sorenson
lancesorenson@agutah.gov
Assistant Utah Attorneys General
Office of the Utah Attorney General

Darcy Goddard
Office of the Salt Lake County District Attorney
Dgoddard@slco.org

/s/ Hannah Swanson
Hannah Swanson
PLANNED PARENTHOOD FEDERATION
OF AMERICA
1110 Vermont Avenue, NW, Suite 300
Washington, DC 20005
(202) 803-4030
(202) 296-3480 (fax)
hannah.swanson@ppfa.org